

## I. % NICOTINE vs AMOUNT OF NICOTINE IN TOBACCO (mg) (all figures on a dry weight basis from CI data)

Often (but not always), the percentage of nicotine in the tobacco of an Ultra Light cigarette is slightly higher than in a higher delivery cigarette (for example, **2.57%** in Merit Ultima vs **2.02%** in Merit). However, **amount** of nicotine (not **percentage** of nicotine) is what is relevant to smokers.

Percentages differ due to blend variations. A different blend is a necessary cigarette characteristic that allows us to decrease the tobacco weight from **598 mg** in Merit to **423 mg** in Ultima. Therefore, the amount of nicotine in the cigarette tobacco is LESS for Ultima (**10.8 mg**) than for Merit (**12.0 mg**).

In short,

	Higher Percentage	permits	Lower Weight	equalling	Less Nicotine
Merit	2.02%	x	598 mg	=	12.0 mg
Merit Ultima	2.57%	x	423 mg	=	10.8 mg

## II. AMOUNT OF NICOTINE vs DELIVERED NICOTINE

However, a smoker could by no means get the 10.8 mg and 12.0 mg of available nicotine that is in the tobacco in Ultima and Merit, respectively, regardless of how the cigarettes were smoked (i.e., number of puffs, depth of puffs, even if smoked with the filters ripped off).

Filtration, ventilation, and smoking dynamics reduce the amount of nicotine (by FTC smoking methodology) received by the smoker to .8 mg for Merit and to .1 mg for Merit Ultima. Compared to the nicotine available in each cigarette's tobacco, this is a reduction of over 93% and over 99%, respectively.

## III. COMPENSATION

Some believe that FTC measurements are not reflective of the true amount of nicotine received by the smoker due to smoker compensation (i.e., number of puffs, depth of each puff, number of cigarettes smoked per day, blocking ventilation holes).

There certainly will be smoker-to-smoker differences depending on number and depth of puffs. The FTC Methodology is a consistent **standard**,

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intended to simulate the "typical" smoker. A good analogy is the miles per gallon standard on each new car sticker; some drivers may get more, some less, but it is a good relative measure with which to compare cars on fuel efficiency.

In fact, smokers of high tar brands do not smoke fewer cigarettes per day (per smoker) than smokers of lower tar brands.

Since ventilation holes are essentially invisible on most brands, few consumers know of their existence or purpose and therefore would be unlikely to block them to "compensate". In any case, for a smoker to block the ventilation holes while puffing would be exceedingly difficult and contrived. One cannot do it with the fingers and have enough filter exposed to comfortably puff on; to do it with the lips would require a highly uncomfortable degree of insertion of the cigarette into the mouth.

Further, there is an extremely strong statistical relationship between FTC measured tar per puff and perceived strength. This relationship is the same for smokers of high tar brands and lower tar brands. Both of these facts are inconsistent with the hypothesis of compensation.

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